IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.: 1:18CR682
Plaintiff,)) JUDGE DAN AARON POLSTER)
v.)
TAMIKO PARKER,)) GOVERNMENT'S MOTION FOR) DETENTION
Defendant.) <u>DETENTION</u>)
)

The United States of America, by and through undersigned counsel, Justin E. Herdman, United States Attorney, and Brian M. McDonough, Assistant United States Attorney, moves this Court for a detention hearing under 18 U.S.C. § 3142(f)(2) for Defendant Tamiko Parker on the basis of danger to the community and a flight risk for the reasons stated in the attached memorandum and on evidence to be presented at the detention hearing. The government requests three days to prepare for the hearing.

Respectfully submitted,

JUSTIN E. HERDMAN United States Attorney

By: /s/ Brian McDonough

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MEMORANDUM

On November 14, 2018, Defendant Tamiko Parker was indicted by a grand jury on one count of theft concerning programs receiving federal funds, in violation of 18 U.S.C. § 666(a)(1)(A). The evidence will show that Parker embezzled over \$172,000 from the Collinwood & Nottingham Villages Development Corporation ("CNVDC") where she worked as Executive Director from 2014 through 2016 by misusing various CNVDC accounts through a variety of schemes that involved the following bank accounts: PNC 6451, Chase 6235, Chase 0354; and credit card accounts: Chase 3512 and Home Depot 8034.

Parker's schemes

PNC Account 6451 – Double Deposits

From October 2015 through March 2016, Parker deposited her paychecks by mobile device into this account. She would white out the mobile deposit stamp and redeposit the paycheck at an ATM. She redeposited 20 paychecks for a total amount of \$30,967.34.

PNC Account 6451 – Withdrawals

From February 2015 through July 2015, Parker made 6 counter withdrawals for a total amount of \$21,968.44. These withdrawals were for personal use.

PNC Account 6451 – Checks to herself

From December 2014 through September 2015, Parker wrote 2 checks to herself and 1 check to cash. The total amount was \$8,500. These checks were for personal use.

Chase Savings 6235 – Money Order

On April 28, 2015, Parker obtained a \$5,000 money order for personal use.

Chase 0354 – Withdrawals

From May 2015 through July 2015, Parker withdrew funds totaling \$27,928.08 for personal use.

Chase 0354 – Checks to herself

From May 2015 through June 2015, Parker wrote checks to herself for \$10,800 for personal use.

Chase 0354 – Debit/ATM

From March 2015 through June 2015, Parker used a debit card to make purchases at Harley Davidson, the Horseshoe Casino, Victoria's Secret, Atlantic City, and Las Vegas totaling \$24,939.35

Chase 6235 – Credit

From September 2014 through July 2015, Parker made purchases at Sephora, TJ Maxx, and Pier 1, totaling \$5,666.05 for personal use.

Home Depot 8034 - Credit

From February 2015 through January 2016, Parker made purchases at Home Depot, totaling \$8,062.35 for personal use.

Rent

From January 2015 through October 2015, Parker leased CNVDC homes and kept the tenants secret from the CNVDC Board of Directors. Parker collected cash rental payment from the tenants. Instead of depositing the rent in the Chase 0354 account, Parker deposited \$29,000 in cash into her personal account.

Parker's Criminal History

Parker's previous criminal history includes prior felony convictions in Summit County and Cuyahoga County Common Pleas Courts for Theft (F4); Theft (F4) and Forgery F5 x 15;

and Theft F4 and Misuse of Credit Cards (F4). She failed to appear at court appearances in her prior cases requiring those courts to issue capiases for her. She has been unsuccessful in successfully completing probation in her prior cases, resulting in probation violations and a subsequent prison sentence of 18 months.

Conclusion

Given the nature and circumstances of the crime charged, the strong weight of evidence against Parker; her prior criminal history of theft and fraud, her failure to appear prior court appearances; and the danger to the community that she presents in committing crimes, the United States moves for her to be detained under 18 U.S.C. § 3142(f) because there are no conditions of release that will reasonably assure her appearance as required and the safety of any other person and the community.

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of November 2018 a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail.

Parties may access this filing through the Court's system.

/s/ Brian McDonough

Brian McDonough Assistant U.S. Attorney